

UNITED STATES DISTRICT COURT
SOUTHERN OF NEW YORK

KEITH THOMPSON

Plaintiff
-Against-

13 CV 1991

INDEX _____
JURY DEMAND

Police Officer Rodriguez, Shield #14441
A police Officer N. Thomas, Shield # 925830

Defendants

CIVIL COMPLAINT

1 - This is a civil action pursuant to 18.U.S.C 241, 18U.S.C 245 filed by Keith Thompson a united State Citizen alleging violation of his constitutional rights, seeking money damages an declaratory judgment.

Jurisdiction

2- This is a civil action pursuant to 18 U.S.C.241, 18 U.S.C 242, 18U.S.C. 245
This court has jurisdiction under 28 U.S.c.1333, Plaintiff also invokes the pendent jurisdiction of this court.

PARTIES

3- Plaintiff Keith Thompson is presently residing at 50-14 Broadway Apt 4D Woodside NY 11377

4- Police officer Rodriguez shield # 1444 ,he is being sued in his individual capacity Police officer Tomas , shield # 925830 he is being sued in his individual an official capacity.

5- Both defendants have acted under the deliberated in difference standard, reckless disregarded absence of policy procedures.

FACTS

6- An intentional tort claim against to city police officers alleges acts of discrimination, harassment, allege act of unhygienic expouser to plaintiff. On March 30, 2012 at 12:26 Pm

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police officers Rodriguez, shield #14441, and police officer N. Thomas shield #925830, stop plaintiff on Baily Ave. W. 193 St Bronx NY

7- Police officer Rodriguez, shield # 14441 approach plaintiffs by the driver side of company truck, I asked Officer Rodriguez if there was a problem, he stated that I was speeding 17 miles past the speed limit.

8- I informed officer Rodriguez , that this was impossible and untrue, officer Rodriguez asked to see my driver license and company tuck papers which where copies , not original ,after I handed papers over at officer Rodriguez, he stated to me Oh!!You enjoy suing police officers; I said what this has to do with this matter.

9- Officer Rodriguez and I began exchanging choice words back and forth, then he went back to his partner Officer N. Thomas shield# 925830, then brought back speeding ticket and truck paper along with my driver license, officer Rodriguez balled up the truck papers and through the papers back into the truck at me, I called him a asshole, he spit at me, sprinkling saliva in my face. Then I continued with my truck company duties.

CLAIMS

FIRST CAUSE OF ACTION

10-The tortuous conduct of the defendants is deemed intentional when it is demonstrated that they clearly intended to violate plaintiff constitutional rights pursuant to 18U.S.C 241 which this statue makes it unlawful for two or more persons to conspire to injure, oppress, threaten or intimidate any person of any state, territory or district in the free exercise enjoyment of any right or privilege secured to him by the constitution of the united states. It further makes it unlawful for two or more person to go on the road way or the premises of another with the intent to prevent or herder his free exercise or enjoyment of any rights so secured.

SECOND CAUSE OF ACTION

11- The actions of the defendants violated federal pursuant to 18 U.S.C. 242 , when officer Rodriguez spit in my face , and balled up company truck papers , an through then in the truck directly at me.

12- Police officer N. Thomas issued a speeding ticket unjustly and gave it to officer Rodriguez to hand it over to me, that's when the problem between officer Rodriguez and I accured.

13-The defendants willfully violated plaintiff constitutional rights pursuant to 18 U.S.C.245 (b) (2) when they bailed up my company truck papers, spit in my face cursed at me and ask me if I enjoyed suing police officers.

RELIEF

Wherefore, plaintiff request this honorable court grant the following relief:

(A) Issue a declaratory judgment that defendants violated United States constitution and federal statutes when they:

1. Bailed up company truck papers and through them at me, spit in my face, bogus ticket, cursing a harassing treating plaintiff, an asking plaintiff does he enjoy suing police officers?

(B) Grant compensatory damages in the following amount:

1. One million dollars against the defendants
2. Grant punitive damages of one hundred thousand against the defendants
3. Grant such other relief as it may appear plaintiff is entitled


Respectfully submitted
Keith Thompson (Plaintiff-Pro se)
50-14 Broadway Apt. 4D
Woodside, NY 11377
(718) 607- 6230

C.C Corporation Counsel
Dept of Law City of N.Y
100 Church St. 4th Floors
New York NY 10007

Sworn to before me this 04 day of May, 2012


Notary

HECTOR C. MONDESI
Notary Public, State of New York
No. 01MO6212939
Qualified in Kings County
Commission Expires October 26, 2013